

PERSON	TASK FORCE SEAT	COMMENT #	COMMENTS	STAFF RESPONSE	NOTES
Bob Brandt	Land Use Attorney	1	Concept 2 is early for a “detailed narrative”. At this milestone, the Applicant should affirm that the development will meet the standards defined by the Ordinance/Policy. Revise this requirement to replace “detailed narrative” with “general compliance narrative” and that the Applicant should identify any requested exemptions and/or alternative paths for compliance.	Specific language for the checklist update will be developed after the policy is adopted. The intention will be to request a general compliance narrative at the Concept 2 stage. This item is added as a new EAP Short-term Action for New Public and Private Development.	
		2	The project types analyzed in WSP's case studies are not small-scale retail, and based on recent experience with a small retail development, the client had very serious concerns about reaching LEED Silver for a variety of reasons. The other aspect of green building certification for small buildings is cost - there is less square footage to spread that cost over than a large multifamily development.	Flexibility from the Green Building Policy will be considered on a case-by-case basis. The Director of Planning and Zoning will determine if the request is justified based upon the information provided with the development application. The City will use the data collected from this process over time to establish consistent criteria and thresholds for alternatives to compliance with the Green Building Policy.	
		3	Clarification on the green overlay bonus density - would this be applied after the project exhausts the affordable housing density bonus first?	Any density bonus given for green building would be on top of that permitted by the zone and would only apply after first exhausting the affordable housing density bonus. The intention is to evaluate this option as an EAP Mid-term Action for Private Buildings.	
Mike Dameron	Residential Home Builder	4	No comments received	N/A	
Garret Erdle	Residential Home Builder	5	What categories of LEED do the directed use performance credits fall within?	For LEED, the water use reduction credits are within the Water Efficiency category. The energy credits are in the Energy and Atmosphere category. Indoor environmental quality credits are within the Indoor Environmental Quality category.	
		6	Process is as important as the Policy that is established. Are small projects behind large projects in the que? Is there a trigger to advance small projects in the process ahead of large projects? When will we see what the process looks like and will I be slowed down by a larger project under review?	Large development site plans (DSP/DSUP) cases are on a separate review track from the small developments, such as a single family home, which typically would not require a DSP/DSUP. A new single family home or addition less than 3,000 sf requires approval of a Grading Plan (GRD) prior to application for Building Permit. The current process today allows both DSP/DSUP plans and GRD plans to be reviewed concurrently. For example, the review period for a second Final Site Plan submission for a large development with 300 apartments is 15 working days, which is the same review period for a new 2,500 sf single family home that submits a Grading Plan for review. If both the Final Site Plan and the Grading Plan are submitted on a Thursday, staff will issue comments on both plans three Thursdays later. Building Permit review also follows the same procedure where large and small development plans are reviewed concurrently. The proposed updates to the Green Building Policy will not add any time to, or change the review process.	
		7	Would the proposed policy apply to small, single family residential buildings that do not require a site plan?	No. The proposed policy that will be adopted by City Council in June will only apply to developments that require a DSP or DSUP. Green building for small developments and existing buildings will be addressed separately since the City cannot require measures above that of the current building code for these types of projects. Proposed strategies to address green building in small developments and existing buildings are proposed as new EAP Short-term Actions and Mid-term Actions for Private Buildings.	
		8	Is a third-party group the one to administer or monitor a project's compliance with the policy still going to be the case?	There are no proposed changes to how the developer chooses to track a project's compliance with the a third party rating system and/or the Green Building Policy. This item will continue to be left to the discretion of the developer. The developer may continue to choose a third-party group or the developer may choose to have the architect track the certification process or the developer may have the means to track that information in-house.	
		9	Since 100% of stormwater pollutant treatment through green infrastructure is challenging, isn't this goal for the City setting up unrealistic expectations? The stretch is commended but will we then be hearing from the community as to why we didn't get it?	100% stormwater treatment is proposed as criteria to strive for, as to lead by example only when technically feasible and cost effective. Public facilities typically have a larger footprint and site than urban infill projects so there is greater possibility to meet this. Analysis of the types of sites where it is particularly challenging to meet 100% will be provided in the staff report.	

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Jenna Hamilton	Third-party Green Building Certification Organization (Green Globes)	10	In summary: Comments provided discuss the feasibility of LEED Gold (or equivalent) standard in private sector development based upon the question asked at the March 13th Task Force Meeting; RE: the WSP analysis of ROI, YOC, and IRR. Green Globes contacted several third-party assessors who are dual-certified to both Green Globes and LEED and a couple of large-scale developers for input on this question. In conclusion, they found that the impacts between LEED Silver and LEED Gold on the private development sector are significant and this amount of increase at this time is not recommended. Those consulted suggested that the City first learn about costs and feasibility of LEED Gold (or equivalent) through implementation in its own public building first before mandating this level of certification on new private developments.	LEED Gold is not proposed for private development at this time.	Full comments provided as a letter under separate cover.
		11	Green Globes has a similar process to LEED in terms of documenting the review process and the final outcome of the green building certification for the project. The City can require from the beginning that the assessor on-site report, which is created when the project is completed, can be shared with the City. The final report won't necessarily go through the design items and/or review. There's always the question of the stigma, but at the end when the report is produced we can make sure that the pertinent information is in the report.	The City intends to request the assessment report for projects pursuing Green Globes and similar documentation (e.g.; final score card) for other accepted rating systems such as LEED. The project's performance information would only be made public (and therefore available to the City) at the end of the certification process.	
		12	For Green Globes, a major renovation is considered to be 25% of the value of the building and then that is treated as a new building. So, the City could come up with a set of triggers for renovations that qualify a project for full compliance Green Building Policy.	The proposed Green Building Policy for Public Development includes the following criteria for existing building renovations that do not trigger a DSP/DSUP: For interior design and construction, and targeted renovations of a single building system, existing public buildings will utilize LEED Gold ID+C and LEED Gold O&M as a guide. Actual third-party certification will be achieved when technically and financially feasible. Further, the City proposes to start a pilot program to construct at least one NZE public building as a Short-term Action for Public Buildings and also complete a study of feasibility and methods to achieve net zero energy in existing building renovations (See EAP Mid-term Actions for Public Buildings).	
Rentz Hilyer	Environmental Group (Northern Virginia Conservation Trust)	13	No comments received	N/A	
Stephen Koenig	Planning Commission	14	Requested clarification to the timing of net zero energy pilot program and delivery of net zero public building.	Start a pilot program to construct at least one net zero energy public building is proposed as an EAP Short-term Action for Public Buildings which will fall within the timeframe of FY2019-2023 and will be coordinated with proposed schools and public facilities of the Capital Improvement Program (CIP).	
		15	Requested clarification on the coupling of net zero with a performance based procurement process.	The pilot program for a NZE public building is now is de-coupled from the performance based procurement approach. See proposed EAP Short and Mid-term Actions for Public Buildings.	
Lisa Lettieri	Architect with LEED Credentials	16	Location and Transportation Credit (Reduced Parking Footprint) – THIS CREDIT IS NOT NECESSARILY AN EASY CREDIT. CREDIT DIFFICULT TO ACHIEVE DUE TO PARKING REQUIREMENTS SET BY THE CITY OF ALEXANDRIA.	This credit is not a recommended priority credit at this time; however, the point is taken that each credit difficult to receive because of an existing regulation or other circumstance means another credit must be achieved to get to the certification threshold required.	
		17	Sustainable Site (Rainwater Management) - RAINWATER MANAGMENET SYSTEM IS DIFFICULT TO ACHIEVE WHEN THE AMOUNT OF WATER NEEDING TO BE MANAGED IS CALCULATED. SOME CASES MAY TAKE UP TO THE WHOLE FOOTPRINT OF A PROJECT.	This credit is not a recommended priority credit at this time; however, the point is taken that each credit difficult to receive because of an existing regulation or other circumstance means another credit must be achieved to get to the certification threshold required.	
		18	Water Efficiency (Cooling Tower Water Use) - NOT ALL PROJECT HAVE A COOLING TOWER WHICH ATOMATICALLY ELIMINATE THESE POINTS	This credit is not a recommended priority credit at this time; however, the point is taken that each credit difficult to receive because of an existing regulation or other circumstance means another credit must be achieved to get to the certification threshold required.	
		19	Energy and Atmosphere (Enhanced Commissioning) - THIS CAN BE DONE, BUT IS COST PROHIBITIVE	This credit is currently recommended by Integral Group and staff recommends discussion of this item at the 4/24 Task Force meeting. Multiple paths are provided for compliance with this credit and may be coupled with the criteria for the Advanced Energy Metering credit, making it potentially more feasible for a wide range of projects.	
		20	Material and Recourses (Building Life-Cycle Impact Reduction) - DIFFICULT TO GAIN THE REDUCTION. THE WAY THIS IS CALCULATED DOES NOT ALWAYS ALLOW FOR THE POINT.	This credit is not a recommended priority credit at this time; however, the point is taken that each credit difficult to receive because of an existing regulation or other circumstance means another credit must be achieved to get to the certification threshold required.	

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Lisa Lettieri	Architect with LEED Credentials	21	Indoor Environmental Quality (Indoor Air Quality Assessment) - THIS REQUIRES COORINDATION BY THE GC. BUILDING FLUSH OUT IS DIFFICULT TO MANAGE AND ACHIEVE.	Staff recommends discussion of the indoor environmental quality directed-use credits at the 4/24 Task Force meeting.	
		22	Indoor Environmental Quality (Daylight) - THIS IS PROJECT TYPE SPECIFIC. IT DOES NOT LEND ITSELF WELL TO A MULTI-FAMILY BUILDING WHICH TYPICALLY FALLS UNDER THE GREEN POLICY REQUIREMENT.	This credit is proposed as an optional directed-use credit for private developments at this time. However, it is recommended as a directed use credit for public developments.	
		23	I’ve had the opportunity to work on multiple building types and always make careful considerations in designing an energy efficient building. Most vendors we specify are on board with providing products that meet the energy code and LEED requirements. The products are getting better and better every day. Our biggest challenge in the profession are getting the contractors on board.	Contractor education can be incorporated into the EAP Implementation/Education and Outreach Chapter. For example, the City can partner with the Virginia Building Code Association (VABA) to offer green building training for contractors.	
		24	Working with the contractor on requires more time by the design professional and sometimes a sustainable consultant to make sure the requirements are met. Larger projects require a sustainable consultant because of the amount of time involved with the documentation. The contractor supports the idea in theory, but it’s the subs who’ve worked the same way for a number of years and it’s a challenge to break from their standard mode of operation. This means an increase in cost that is not always factored into the cost of the construction. This consultant fee is added to the design costs.	Sustainable consultants can still be utilized with the proposed Policy. Contractor education can be incorporated into the EAP Implementation/Education and Outreach Chapter. For example, the City can partner with the Virginia Building Code Association (VABA) to offer green building training for contractors.	
		25	I support the Green Building Policy, but feel more effort should go towards developing a Green Building Division similar to DC before increasing the requirements to Public and Private developers that require a third party reviewer such as LEED.	Staff recognizes that additional resources may be needed to implement the proposed Policy and will evaluate the feasibility of a new position or absorption of the responsibilities with existing positions.	
		26	As a standard we need to adhere to the current Energy Code which in some ways goes beyond what Green Building Policy currently requires. Putting the onus on a developer to go LEED Gold just means they have to spend more money to meet the Gold requirement. Regardless of what the report states – it does cost more. I don’t support going beyond LEED Silver at this time.	LEED Gold is not proposed for private development at this time.	
		27	Making project information public is still an issue (to Ken Wire’s point about the stigma of not reaching the desired level of certification) because the progress is made available, not just the end result.	Per Brendan Owens, it depends on what the developer chooses to make public: just the scorecard or the review comments. The City intends to request the assessment report for projects pursuing Green Globes and similar documentation (e.g.; final score card) for other accepted rating systems such as LEED. The project’s performance information would only be made public (and therefore available to the City) at the end of the certification process.	
Brendan Owens	Environmental Policy Commission	28	A. renovation of existing public buildings in the gb policy i. major renovation of existing public buildings - when a public project is undergoing a significant modernization/major renovation the project should be subject to the gb policy performance and certification requirements ii. establish systems level guidelines based on gb policy performance targets - when a public project is undergoing a targeted renovation of a single building system (hvac, roof, windows, plumbing, etc) the performance goals of the gb policy should be met by the renovated system iii. specific recommendation for gb policy: move public building renovation requirements into phase 1	The proposed Green Building Policy for Public Development includes the following criteria for existing building renovations that do not trigger a DSP/DSUP: For interior design and construction, and targeted renovations of a single building system, existing public buildings will utilize LEED Gold ID+C and LEED Gold O&M as a guide. Actual third-party certification will be achieved when technically and financially feasible. Further, the City proposes to start a pilot program to construct at least one NZE public building as a Short-term Action for Public Buildings and also complete a study of feasibility and methods to achieve net zero energy in existing building renovations (See EAP Mid-term Actions for Public Buildings)	
		29	B. interior design and construction projects should be subject to gb policy performance and certification requirements utilizing a certification program appropriate for the scope of the project i. specific recommendation for gb policy: move ID+C renovation/fit-out requirements into phase 1	The proposed Green Building Policy for Public Development includes the following criteria for existing building renovations that do not trigger a DSP/DSUP: For interior design and construction, and targeted renovations of a single building system, existing public buildings will utilize LEED Gold ID+C and LEED Gold O&M as a guide. Actual third-party certification will be achieved when technically and financially feasible. Further, the City proposes to complete a study of feasibility and methods to achieve net zero energy in existing building renovations (See EAP Mid-term Actions for Public Buildings)	
		30	C. public buildings net-zero pilot/performance based procurement: i. the draft policy couples together a goal for one net zero public building together with piloting a performance based procurement process although i’m not entirely clear why this is the case ii. we should be able to establish net zero energy goals for public buildings separate from the pilot testing of performance based procurement iii. specific recommendations for gb policy: 1) move public building net-zero goals into phase 1 the gb policy; 2) establish performance based procurement pilot separate from net zero goals	Net zero energy (NZE) is now proposed as its own performance target for public buildings (see cover page of the proposed Policy). Public building projects will strive to achieve NZE through a combination of energy efficiency and renewable energy systems provided it is technically feasible, cost effective, and situationally appropriate. The NZE target is no longer coupled with a performance based procurement program pilot. Refer to EAP Short and Mid-term actions for Public Buildings. Further, the City proposes to complete a study of feasibility and methods to achieve net zero energy in existing building renovations (See EAP Mid-term Actions for Public Buildings).	

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Brendan Owens	Environmental Policy Commission	31	E. energy, water, ieq performance/measurement i. the establishment of design expectations for projects is step 1. step 2 is ensuring that the projects, once built and operational, deliver the performance they were designed to achieve ii. to accomplish this, i would like to know if it's possible to require, as a condition of dsp/dsup/sup approval, that projects authorize the third party certification agency they work with to provide city staff have access to the on-going energy/water performance data that projects are required to submit as part of their certification. iii. specific recommendations for gb policy: 1) require private development to authorize city staff to access on-going performance reporting that is required by gb certification	See proposed EAP New Short-term actions for New Private and Public Development. Staff proposes to update the standard development conditions to address City access to performance data and will consider this information with development of that condition language.	
		32	F. implementation of a green building education advisory amendment to the city's code enforcement/building permit activities i. we touch on this in stage 2 item c. but i'd like to see it pulled into this policy update rather than reside in the EAP ii. i understand that we don't have any real leverage on the codes side of the equation but not utilizing this touch point between the city and a building undergoing renovation seems like a significant lost opportunity. iii. i would like to see the city implement green building education geared specifically at projects that do not require a dsp/dsup/sup (projects that only require a building permit). iv. we can direct projects to education content, resources, alternatives, guidelines, etc. to nudge them in the direction of better decisions. v. specific recommendations for gb policy: 1) develop education/nudge content for projects that require building permits	Green building items related to the Policy but require additional time, program development, and/or staffing are proposed as EAP Mid-term actions. However, PZ staff recommends that creation of a Green Building Resource Guide for new and existing small buildings not subject to site plan review, including historic properties, be incorporated as a new EAP Short-term Action in the Education and Outreach Chapter of the EAP.	
		33	G. epc would like to see analysis of the expected ghg reduction impact of various policy scenarios i. aggressive energy use targets ii. moderate energy use targets iii. conservative energy use targets	The impact analysis prepared by the consultant, Integral Group, was based upon the first short term action for the EAP Phase 1, Green Building Chapter, which included an analysis of green building strategies that would have the greatest impact toward achieving targets across EAP principle areas with a focus on GHG emissions, water use, and stormwater. There is no funding for additional analysis at this time. Refer Section 5.3 Impact Assessment (page 11-14), Table 8 & Table 9, and Section 6.16 Projected Environmental Impacts (beginning page 26) of Integral Group's report for an analysis of the projected environmental impacts associated with the proposed recommendations.	Collective comments from EPC
		34	H. there is an opportunity to harmonize the on-going open space discussions with the new gb policy i. there are challenges with the timelines ii. new open space requirements could be overlaid onto new gb policy similar to relationship between stormwater requirements iii. ability to harmonize open space credit in leed and/or open space requirements in sites should be explored	The Green Building Policy update will support the outcomes of the Open Space Study. More than half of LEED certified projects in the City have achieved the LEED Open Space Credit and are continually encouraged to do so. A number of principles in the SITES rating system are met with the 2019 Landscape Guidelines, the existing stormwater management requirements, and through the City's standard planning processes.	Collective comments from EPC
		35	Requested clarification on the stormwater treatment required for private development.	The City recently underwent a collaborative process with the private development community to establish a percentage of on-site state phosphorous removal from stormwater. The original ask from the City was 100% of phosphorous removal but through coordination with the development community found that this was not feasible in most cases. The result of the coordination is a new requirement for 65% of phosphorous removal on-site through green infrastructure techniques. This new requirement applies to all new development and redevelopment; therefore, all projects subject to a DSUP/DSP and the Green Building Policy must comply with the stormwater requirements. Also see page 24 of Integral Group's report for a summary.	
Chris Pyke	Third-party Green Building Certification Organization (USGBC)	36	Favors the directed use approach to articulate what projects are expected to achieve.	The directed-use approach continues to be an element of the proposed Policy for public and private development.	
		37	Performance measuring is needed now to measure the performance for a fixed term - not suggesting public disclosure just to follow through on those items provided to the City 3-5 years into the future.	See proposed EAP New Short-term actions for New Private and Public Development. Staff proposes to update the standard development conditions to address City access to performance data and will consider this information with development of that condition language.	

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Chris Pyke	Third-party Green Building Certification Organization (USGBC)	38	Projects have the option to be non-confidential through LEED, which the City can require with the DSP/DSUP conditions. By selecting non-confidential, the project information at the end of certification will become public and available to the City. By being non-confidential, a scorecard could be readily displayed for the project information and streamline the process.	See proposed EAP New Short-term actions for New Private and Public Development. Staff proposes to update the standard development conditions to address City access to performance data and will consider this information with development of that condition language.	
		39	It is very important that the City make performance tracking for their own buildings available to the public.	The City is in the process of creating an online dashboard that will make public building performance tracking available to the public. See proposed EAP New Short-term Actions for Public Buildings.	
Don Simpson (Chair)	Large-scale Developer	40	Performance Monitoring is important and recognize that it is coming and we issue educational material to communicate the intent and prepare for it.	Establishment of a Performance Monitoring Program is proposed as a EAP Mid-term Action for Private Buildings.	
		41	There are interior renovations where you can spend \$2 million on finishes, etc. where you're not even touching the systems but I would agree with the guidelines for targeted renovations such as new roof.	Private development renovations that do not trigger a DSP/DSUP will not be subject to the Policy. However, Staff proposes to a new Short-term Action for the Education and Outreach Chapter of the EAP to create a Green Building Resource Guide for new small buildings and renovations to existing small buildings not subject to site plan review, including historic properties to facilitate greener renovations. The proposed Policy for New Public Development now includes criteria for existing public building renovations. It proposes LEED Gold for Interior Design and Construction (ID+C) and LEED Gold Operations and Maintenance (O&M) standards as a guideline for interior design and construction projects and targeted renovations of a single building system (e.g.; HVAC, roof, windows, plumbing, etc.). Actual third-party certification will be achieved when technically and financially feasible. Further, the City proposes to complete a study of feasibility and methods to achieve net zero energy in existing building renovations.	
Jennifer Skow	Affordable Housing Developer	42	I reached out to our architect to provide some insight for us; unfortunately, they didn't find a quick, clear cut path to compare our project against LEED. However, the project architects felt that LEED was no more elite than Earthcraft. See his attached email.	Upon further coordination with Eartcraft after the March Task Force meeting, some errors were identified in Integral's report as they relate to Earthcraft's rating system. Integral is updating the report to correct those errors and the report will be reissued with the April Task Force meeting materials. As a result, Staff is working with Earthcraft representatives to create an overlay to their system which will ensure performance design targets are met in the areas of energy, water use and indoor environmental quality equal to that of LEED.	
		43	The consultants and other GBTF members mentioned DC as a model for Green Building, particularly as it relates to affordable housing. I agree. But it is important to note that as the District was strengthening its green building standards, so too was the Mayor/Council strengthening their contribution towards affordable housing development. For about the last 5 years, DC has appropriated \$100 million for its local housing production trust fund, and the new FY budget released shows \$130 million. This is on top of about \$40 million in federal entitlement monies from HUD.	It is understood that the District has a different funding and contribution structure than DC for affordable housing development.	
		44	Overall, I agree with the consultant's proposed flexibility for affordable housing and green building, allowing room to evaluate project feasibility.	Flexibility will continue to be a component of the proposed Policy. See the proposed Policy cover page. Additionally, the City is currently working with Green Globes and Earthcraft to create an overlay of their system equivalent to the LEED directed use credits.	
		45	Another option to consider - the City could launch a pilot green building initiative - turn-key homeownership, deeply green retrofit or new construction - to test green building policy with a local development partner. This would inform policy and help serve as a case study, leading the way for other developers. This would also help inform how much City contribution is needed per project for affordable housing to install and maintain green systems.	This recommendation deserves further exploration with a proactive discussion on how to exceed standards and advertise our interest in, and pursuit of, grants or other sources of funding to implement.	
Alexandra Taylor	Environmental Consultant	46	I am not sure of the purpose of the additional outline with Brendan's comments, was this to replace the original outline. There are some thresholds that were on that outline that were not on the original and i am not sure which one we are going with.	The additional outline with Brendan's comments is not a replacement for the original outline prepared by Staff and issued to the Task Force prior to the March 13th meeting. The additional outline was provided by Brendan to communicate his comments on Staff's outline.	

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Alexandra Taylor	Environmental Consultant	47	For meeting water efficiency, indoor air quality, and energy use IIB in the outline. These are already prerequisites that must be met in LEED v4. I think we need to add meeting above the threshold of the prerequisites in these targeted areas. For Public and Private New Construction and Major Renovations: WE (Water Efficiency) Category: Indoor Water Use - Prerequisite reduction of 20% - We Should Target for 30% Outdoor Water Use - Prerequisite reduction of 30% - We Should Target 50% ( This would allow applicants to gain a point in these categories) EA (Energy and Atmosphere) Category: Fundamental Commissioning is required, Can we add Enhanced Commissioning	The intention of the directed-use performance targets, or priority credits, in the areas of Energy, Water and Indoor Environmental Quality is to exceed the prerequisite standards in the respective category for each rating system. The specific performance targets/credits recommended by Integral Group are listed in Table 8 and Table 9 of their Final Technical Report for New Private Development and Section 6.2.1 (page 20) of the report for New Public Development. The directed use credits are now listed in the proposed Policy for private development and for public development. For private development, this equates to a target of 40% indoor water use reduction and 50% outdoor water use reduction. For energy, the directed use credits equate to >30% EUI reduction for New Construction, 6% onsite renewable energy or 40% offsite renewable energy, and advanced energy metering for the whole building and end uses making up over 10% of the building load. Three credits under Enhanced Commissioning is proposed as a directed use credit for public development. Equivalent credits in Green Globes and Earthcraft are currently under review.	
Michael Wilson	Large-scale Developer	48	Indoor Water Use: The target should be equal to the prerequisites for LEED (WEp2). This performance target can be increased to the equivalent of 1 point for WEc2, but reducing use by 40% from LEED V4 baseline for all uses is not feasible for all developments, including multi-family. Hospital and industrial uses should be exempted, as well.	See comment response above. Further, the Indoor Water Use credit for 40% reduction is commonly achieved by projects in Alexandria (89% of LEED certified projects have received this credit) primarily through specification of low-flow fixtures.	
		49	Performance Monitoring (water use): This needs to be better defined. This could be best reported by Virginia American Water Co. in lieu of another burden on the property owner.	Further detail on the performance monitoring methods will be explored during development of the program in the mid-term timeframe. See EAP Mid-term Actions for Private Buildings.Options include utilizing access to reporting data via LEED and reporting through the utility companies.	
		50	Onsite renewable energy is not achievable for new construction projects with a small footprint (e.g. sites less than 0.75acre). Revise this target, as described in the Integral Table 1, to read “Buildings subject to DSUP should be designed to have 5% of their total site energy supplied by onsite renewable energy, or Applicants shall purchase green power (LEED EA c7) and contribute \$5,000 to a TBD Sustainable City Fund.”	LEEDv4.1 Renewable Energy Credit and Green Globes Renewable Energy Criteria offer a pathway for off-site renewable energy if the on-site renewable energy is not feasible. Staff is currently coordinating with Earthcraft to develop a same strategy. Staff is interested in the Task Force's comments on a fee-in-lieu structure for credits that cannot be achieved and plans to have a discussion on this at the April Task Force meeting.	
		51	Enhanced Commissioning carries a premium for the Cx Agent, as well as the trade contractors; most notably for multi-family and transient lodging uses due to the quantity of systems and equipment involved. Enhanced Commissioning is a benefit to a healthy building, but there should be exemptions for residential and hotel uses to avoid hardships or burdens. -Alternatively, Enhanced Cx could be an alternative path for EUI targets, as the Cx process ensures equipment and systems are operating efficiently and correctly.	This credit is currently recommended by Integral Group and staff recommends discussion of this item at the 4/24 Task Force meeting. Multiple paths are provided for compliance with this credit and may be coupled with the criteria for the Advanced Energy Metering credit, making it potentially more feasible for a wide range of projects.	
		52	Measurement and Verification: This is costly and challenging to enforce beyond Day 1 of occupancy for residential uses. Consider limiting this to Commercial uses only, or provide an incentive. This is better rolled into the Stage 2 outline.	The Advanced Metering credit is for whole-building metering and sub-metering for any end uses making up over 10% of the building load. An alternative compliance path through LEED for documentation of Energy Star (or similar) reporting and/or submetering is an option for the Task Force to consider.	
		53	IEQ: Require equivalency to LEED prerequisites for other certification programs. IEQ: Include Integral recommendation for public buildings.	Currently, a directed use credit for low-emitting materials is proposed for both public and private development. Public development will also be expected to achieve the Daylight credit and additional points that are TBD in IAQ. Staff recommends the Task Force discuss the IEQ directed use credits for both private and public development at the 4/24 meeting.	
		54	I recommend not excluding Earthcraft from non-affordable projects. It should be allowed as an alternate path as an equivalent for all residential projects with defined parameters or additional green overlays, such as mandatory Water Sense and Energy Star. I recommend having Viridiant provide an Earthcraft worksheet for their interpretation to LEEDv.4 Silver, including the addition of the directed-use performance credits required for all certification systems, and either increase those directed-use performance credits where Earthcraft is perceived as lacking or require the purchase of green power with a monetary contribution to a TBD Sustainable City Fund to be defined under Stage 2.	Upon further coordination with Eartcraft after the March Task Force meeting, some errors were identified in Integral's report as they relate to Earthcraft's rating system. Integral is updating the report to correct those errors and the report will be reissued for the April Task Force meeting. As a result, Staff is working with Earthcraft representatives to create an overlay to their system which will ensure performance design targets are met in the areas of energy, water use and indoor environmental quality equal to that of LEED.	

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Michael Wilson	Large-scale Developer	55	Concept 2 is early for a “detailed narrative”. At this milestone, the Applicant should affirm that the development will meet the standards defined by the Ordinance/Policy. Revise this requirement to replace “detailed narrative” with “general compliance narrative” and that the Applicant should identify any requested exemptions and/or alternative paths for compliance.	Specific language for the checklist update will be developed after the policy is adopted. The intention will be to request a general compliance narrative at the Concept 2 stage. This item is added as a new EAP Short-term Action for New Public and Private Development	
		56	Consider citing exemptions for types of public uses to avoid constraints or hardships.	Flexibility from the Green Building Policy will be considered on a case-by-case basis. The Director of Planning and Zoning will determine if the request is justified based upon the information provided with the development application. The City will use the data collected from this process over time to establish consistent criteria and thresholds for alternatives to compliance with the Green Building Policy.	
		57	Existing building incentive programs: Incentives should be outlined.	Incentives for existing buildings will be developed further as EAP New Short-term and Mid-term Actions.	
		58	Consider the inclusion of the purchase of green power and alternate paths other than renewable energy for an incentive or trade-off with other contributions. Allow path via innovative design in addition to strict adherence to certification credits. Allow bonus density and height with the justification that even with the added density the green policy and performance targets greatly reduce the footprint versus an otherwise by-right development.	The proposed directed use credit for Renewable Energy in LEED v4.1 provides points for some off-site renewable energy. For 2 LEED points, the applicant may either provide 6% on-site renewable or 40% off-site renewable. Similar metrics will be used in Green Globes and Earthcraft.	
		59	As a discussion point, the Arts Corridor (arts anchor bonus) provides a reasonable outline to follow. Similar to the Arts District, any green overlay district will pertain to a limited zone of the City. Consider requiring an in-lieu monetary contribution for existing regulatory incentive programs if the green building incentive can be implemented onsite.	Specifics details of the Green Overlay Zoning will be discussed during the development of the regulations in the mid-term timeframe. See proposed EAP Mid-term Actions for Private Buildings.	
		60	[The request for performance data] is reasonable if the maximum extent of such performance monitoring and reporting is defined. That is, absent the establishment of the program, the Applicant should be required to “register the project with Energy Star, and shall annually submit a log of energy consumption and expense to the City of Alexandria.”	Further detail on the performance monitoring methods will be explored during development of the performance monitoring program in the mid-term timeframe. See proposed EAP Mid-term Actions for Private Buildings. Options include utilizing access to reporting data via LEED and reporting through the utility companies.	
		61	Mandating green building practices on existing buildings would be best done if coupled with an incentive program. As opposed to requiring this of each private property owner, perhaps limit it to either a) private developments exceeding 50,000 GSF on a single parcel, or b) legislatively require the private utilities to report the energy usage by parcel number and in a format that can be sorted and aggregated (e.g. MS Excel).	Incentives for existing buildings will be evaluated as an EAP Mid-term Action for Private Buildings. Advocating for state-enabling legislative authority to enable local jurisdictions to require energy performance disclosure by private building owners and/or utility companies is also proposed as an EAP Mid-term Action for Private Buildings.	
		62	A “major renovation” [for public buildings] shall be any renovation that includes any of the following components: a. Razing of any existing structure more than 5,000 GSF. b. Change in Use associated with a Building Permit. c. Any increase in density exceeding 10%. d. total cost of the renovation relating to the envelope or its systems is higher than 25% of the value of the building. e. Modification of more than 50% of the gross building square footage.	A renovation of an old office building to a school building is likely to trigger a DSP/DSUP and would therefore be subject to the Green Building Policy. For renovations that do not require a DSP/DSUP, such as a system renovation, such as an HVAC upgrade, the proposed Policy for Public buildings include use of LEED Gold standards for ID+C and O&M as a guideline with actual certification if financially feasible. Further, staff proposes to complete a study of feasibility and methods to achieve net zero energy in existing building renovations as an EAP Mid-term Action for Public Buildings.	
		63	Long term actions: Alexandria should consider neighborhood connectivity. In addition to the requirements of LEED v4 being harder and more costly, Alexandria’s public transit network does not allow for 1-3 points that should ordinarily be a given in a sustainable city with readily accessible bus stops, bike routes, walkability scores, and light rail. Consider a revision to the policy and/or use of the usual Bikeshare Contribution that accompanies DSUP approvals. Perhaps widening the description of the Contribution to a “Sustainable City Fund” to allow use of funds for public improvements by T&ES, Transportation and RP&CA beyond the Capital Bikeshare network.	Staff would like more information from the Task Force on this topic, such as what specific elements of our transit network are prohibitive to meet those credits. We will use that information to coordinate with T&ES initiatives.	
Ken Wire	Development Association (NAIOP)	64	Concept 2 is early for a “detailed narrative”. At this milestone, the Applicant should affirm that the development will meet the standards defined by the Ordinance/Policy. Revise this requirement to replace “detailed narrative” with “general compliance narrative” and that the Applicant should identify any requested exemptions and/or alternative paths for compliance.	Specific language for the checklist update will be developed after the policy is adopted. The intention will be to request a general compliance narrative at the Concept 2 stage. This item is added as a new EAP Short-term Action for New Public and Private Development	

PERSON	TASK FORCE SEAT	COMMENT #	COMMENTS	STAFF RESPONSE	NOTES
Ken Wire	Development Association (NAIOP)	65	LEED Silver is a concern for the townhome developers. Maybe allow flexibility for LEED Certified for 10 or less townhomes (or another threshold)	Flexibility from the Green Building Policy will be considered on a case-by-case basis. The Director of Planning and Zoning will determine if the request is justified based upon the information provided with the development application. The City will use the data collected from this process over time to establish consistent criteria and thresholds for alternatives to compliance with the Green Building Policy.	
		66	Need clarification on when the Policy will take effect and when it will apply.	It is anticipated that Completeness Plans submitted in Spring 2020 will be subject to comply with the updated Green Building Policy. This means project with Concept Plans submitted in Fall 2019 should prepare for the Policy's implementation in the Spring. Staff will utilize memos to industry and eNews to remind industry professionals of this update.	
		67	Allowing equivalencies to LEED is a good approach, especially for the townhome developments.	Acknowledged. Staff is working with Green Globes and Earthcraft to create an overlay for their rating systems that will meet Alexandria's performance design targets. Verification through an independent third-party will also be permitted through the exemptions process. The first project to do so will be treated as a pilot and the City will consider incorporating this method as an inherent standard to the Policy.	
		68	Monitoring is difficult for landlords, and how does one measure the % reduction in water - does this mean they need to insert provisions in their leases to tenants on how many showers can be taken per day, etc.?	For LEED, the % reduction is measured from the LEED baseline case and is commonly achieved through specification of low flow fixtures. 89% of LEED certified projects in the City have received this credit. The method of monitoring, such as utilizing utility data, will be developed during the formation of a Performance Monitoring Program.	
Ken Wire	Development Association (NAIOP)	69	The draft needs to be widely distributed to the industry for comment.	The draft Policy will have a day public comment period beginning on April 27 (the City's Earth Day event) thru mid-May. Additional outreach to NAIOP can be provided if needed.	
		70	Most developers want to shoot higher than the minimum certification but do not want the stigma if they do not meet it. When the project is done, it's not a problem but during the process they don't want that visibility in the event that they do not meet it.	The project's performance information would only be made public (and therefore available to the City) at the end of the certification process.	
		71	Clarification requested on the green zone overlay - possible density bonuses proposed in stage 2. Height limits need to be considered, such as in Potomac Yard where it is limited by FAA. Every small area plan may not need to have this and you do not want a small area plan and a green building policy saying different things.	Any density bonus given for green building would be on top of that permitted by the zone and would only apply after first exhausting the affordable housing density bonus. The intention is to evaluate this option as an EAP Mid-term Action for Private Buildings.	
Debra Yap	Alexandria City Public Schools	72	No comments received.	N/A	





March 19, 2019

To: City of Alexandria, VA Green Building Task Force

From: Jenna Hamilton, Green Building Initiative, Task Force Member

Re: On the question of private sector certification level

At the March 13, 2019 meeting of the Green Building Policy Update Task Force, the staff asked for comments on the cost analysis presented in the financial report provided by WSP consultants. Specifically, they noted that in Table 4 of that report ("Green Building IRR and YOC Impacts") the difference in the financial return of LEED Silver vs. Gold projects was very slight and asked the question, given the slight difference, is it feasible to then say that perhaps all private projects in the City's jurisdiction should be held to a Gold (or equivalent) minimum certification level, rather than the City's proposed Silver (or equivalent) minimum certification level? They noted that while this appears to be only a slight difference on paper, they wanted a better understanding of whether this would be the case in reality.

Following the meeting, GBI reached out to several of our third-party Green Globes Assessors who are dual-certified to both Green Globes and LEED and whom we know currently do both LEED and Green Globes projects. We also contacted a couple of our larger developer clients who use both certification systems to ask for their input on this question and I shared with them the information in the WSP report.

Our team universally noted that it was difficult to get a firm grasp on the underlying content that was used for analysis in the report, noting for example that, "It would be helpful to understand the full dataset but there does not appear to be any detail on this other than the following note: 'Cost estimates are based on published financial studies, reports, and our experience.'" One noted that "the cost studies in the final page of the report range in age from 2003-2016, but most are in the 2003-2009 range. This is particularly curious as the sunset date for LEED v3 (2009) projects was not that long ago. The cost data does not appear to be fully representative of actual recent costs and actual LEED v4 projects that have been certified."

They noted that from their on-the-ground perspective the costs associated with different levels of certification can vary greatly depending on the type of building, the size, and complexity. In the private sector for example, "the range for commissioning alone can vary from \$0.50-\$3.00/SF depending on these factors." And they also noted that, "especially if a locality is rotating off of a policy that allowed some projects to achieve LEED Certified/or equivalent, and would now be asking for a Gold/3 level of certification, that could be a dramatic cost impact to those projects. Many projects have complex financing and cannot bear the extra costs, even going from LEED Silver/Two Green Globes to a LEED Gold/Three Green Globes." Another noted, "The trend within industry is for budgeting and financing to be set based on prior projects, so I wouldn't say that a 1% increase will be seen as negligible to developers—the financing is for a certain amount and it's not a trivial thing for them to add even 1% to total cost, even if the ROI was amazing."

They also noted that from looking at the analysis, the real-world cost premiums generally “seemed low [*compared to projects they see in the field—ed.*], most especially those listed for Net Zero Energy buildings.”

One dual-certified assessor who has work with both public and private sector projects noted that, “When [we] work for long-term hold clients such as hospitals, they may incur a smaller percentage of increased cost because they were already planning for energy efficiency, high IEQ, etc.....These clients may use energy modeling and commissioning because they are best practices, not because of any requirements or added points.....However, when you look to developer projects for offices and hotels, their baseline sometimes doesn’t include energy and water efficiency and other strategies. These are more likely to be code-minimum facilities with a shorter anticipated hold. For them, the cost to upgrade to the next level will be higher.” He went on to say that “for the types of projects the city may be likely to see come in most frequently: office buildings and hotels for example—requiring Three Green Globes or LEED Gold certification will likely get market pushback, noticeably more so than Two Green Globes or LEED Silver.”

Both assessors and developers noted that the cost increases between Silver and Gold under LEED v. 2009 were slighter than they are under LEED v4. They suggested that the city should not attempt to mandate the Gold/Three Green Globes level in private projects until they have a better understanding of the practical impacts of the differences between the more familiar LEED v3 (2009) and the newer LEED v4. One assessor in particular said, “we have been working on several projects and the issue we are having is even getting to the Certified level because of the site and transportation credits that LEED has in place under v.4. Owners are looking at spending additional 100-200k to get to Certified and possibly get to Silver....To achieve Gold or Silver, some type of enhanced Cx (Building Envelope Cx, etc.), REC’s and advanced energy metering will need to be installed. This alone can add an additional \$100k-\$200k on the project depending on what needs to be completed.” This assessor said that they are advising clients that the minimum cost to move from Silver to Gold is an additional \$100,000, “due to the increased Cx efforts or energy metering installations under the newer LEED version.” And he noted that the minimum cost they cite also depends on size and complexity of the building. These costs are not insignificant to developers and their financing plans. And again, the motivation of the building owners is often very dependent on the anticipated use of the building, and how long they expect to hold the asset.

In conclusion, the assessors noted that achieving Two Green Globes/LEED Silver are themselves “great achievements because you already have to go above and beyond to make sure the building is operating as intended.” Their ultimate recommendation is that the City of Alexandria move forward with its proposal to mandate a LEED Silver/Two Green Globes certification level for private sector projects. They suggested that the City would learn a lot about costs and feasibility through the mandate of LEED Gold/Three Green Globes for public sector buildings and that the ‘case studies’ created in those projects would provide a better analysis of the potential localized impacts on private sector Alexandria projects, for future policy consideration.

Thank you for providing GBI with this opportunity to share some thoughts from the third-party dual-certified assessors and developers who work with the major certification systems in the field each day.